

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to Gaston J.  
Roberts, Jr., and wife Jan Roberts |  
Case No. 1:20-cv-00946-RBK-JS**

MDL No. 2875

**Honorable Renée Marie Bumb,  
Chief Judge**

**[PROPOSED] ORDER  
ESTABLISHING CASE  
MANAGEMENT SCHEDULE**

**The Parties Having Met and Conferred**, as instructed by the Court, to set the deadlines for a case management schedule for the upcoming bellwether plaintiff trial in *Gaston J. Roberts, et al. v. Zhejiang Huahai Pharmaceutical Co., Ltd. et al.*, and

**The Court Having Reviewed** the parties' jointly proposed schedule, and resolved the parties' one outstanding dispute (*see* ECF No. 2935),

**IT IS ORDERED:** the deadlines for the upcoming *Roberts* trial are:

<b>Event</b>	<b>Date</b>
Deadline to amend Plaintiff Fact Sheet	12/2/2024
Close of case-specific fact discovery	2/14/2025
Deadline for Plaintiff to designate experts and serve expert report(s)	2/28/2025
Deadline for Defendants to designate experts and serve expert report(s)	3/31/2025
Depositions of experts	4/1/2025-

<b>Event</b>	<b>Date</b>
	4/28/2025
Close of expert discovery	4/28/2025
Deadline for parties to exchange deposition designations	5/1/2025
Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions	5/12/2025
Deadline to submit deposition designations, objections, and counter-designations to the Court	5/30/2025
Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions	6/16/2025
Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions	7/2/2025
Deadline to file motions in limine	7/14/2025
Deadline to file oppositions to motions in limine	7/31/2025
Deadline to submit joint final pretrial order	8/11/2025
Deadline to file pretrial briefs	8/14/2025
Deadline to file: (i) joint proposed jury instructions; (ii) joint proposed jury questionnaire; and (iii) joint verdict sheet	8/18/2025
Deadline to file responsive papers to pre-trial briefs	8/21/2025
Deadline to submit: (i) witness lists; and (ii) exhibit lists	8/26/2025
Pretrial conference (via Zoom)	8/28/2025
Trial begins	9/8/2025

Hon. Thomas I. Vanaskie (Ret.)  
Special Master